## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	)	
Plaintiff,	)	Case Number: 18 CR 51-ENV
	)	
v.	)	
	)	
INNA CHEBANENKO	)	
Defendant.	)	

## UNOPPOSED MOTION FOR PERMISSION TO TRAVEL WHILE ON BOND

NOW COMES the Defendant, Inna Chebanenko, through her attorney Gal Pissetzky, and respectfully requests that this Honorable Court allow her to travel to California and Florida while on bond. In support of his request, Mrs. Chebanenko states the following:

- 1. On January 25, 2018, Mrs. Chebanenko was released on bond requiring her to remain in the Northern District of Illinois, unless she was required to appear in court in the Eastern District of NY.
- 2. Mrs. Chebanenko has been in full compliance with her pre-trial release.
- 3. On January 13, 2021, this Honorable Court granted Mrs. Chebanenko's request to travel to Miami, Florida and remain there until February 28, 2021.
- 4. Mrs. Chebanenko is respectfully requesting to be allowed to remain in Miami, Florida with her family until March 16, 2021 and then to return to Illinois.
- 5. This court granted prior requests to travel, and Mrs. Chebanenko always complied with all her release conditions.
- 6. Counsel discussed this request with the government and pre-trial, and they do not object to this request.

WHEREFORE, Mrs. Chebanenko respectfully requests this Honorable Court grant her motion.

/s/Gal Pissetzky
Gal Pissetzky
35 E. Wacker Dr.
Suite 1980

Respectfully submitted,

Chicago IL 60601 (312)566-9900

## **CERTIFICATE OF SERVICE**

The undersigned, Gal Pissetzky, hereby certifies that in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, and the General Order on Electronic Case Filing (ECF), the

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was served on February 16, 2021, pursuant to the district court's Rules.

Respectfully submitted,

/s/ Gal Pissetzky
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